

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R97-1

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POSTAL RATE AND FEE CHANGES, 1997

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## **UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF RESPONSES TO MCGRAW-HILL INTERROGATORIES**

The United States Postal Service hereby moves for late acceptance of its responses to McGraw-Hill interrogatories MH/USPS-T30-2a-d. These interrogatories were filed on September 17, 1997. The answers were due to have been filed on October 1, 1997.

The delay in responding to these interrogatories is attributable to a combination of circumstances. The nature of the requested information being disclosed required extensive internal consultations throughout several layers of postal management in several departments. Timely completion of these consultations was made more difficult by the occasional unavailability of critical personnel during the process. Preparation for and participation in hearings last week by witness O'Hara and counsel further delayed the "closing of the loop" internally. Finally, counsel's unavoidable absence from the office from October 10th through the 14th resulted in the responses not being ready to be filed until today.

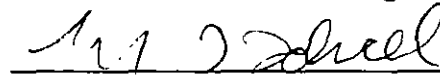
The Postal Service regrets the delay in filing these responses and will fax copies to counsel for McGraw-Hill today to mitigate the effects of the delay which has transpired to-date.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

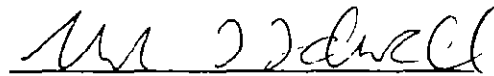


Michael T. Tidwell

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Michael T. Tidwell

October 16, 1997